

# EXHIBIT L

**From:** Adam Slater <[ASlater@mazieslater.com](mailto:ASlater@mazieslater.com)>

**Date:** April 23, 2021 at 6:16:13 PM EDT

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**Subject:** B. Chen

Counsel:

Please advise as to whether you will agree to production of Baohua Chen's custodial file within 10 days. Plaintiffs believe that this is a reasonable request, including based on testimony provided by Min Li this past week. If not, we can add to the agenda for this week's conference. If you would like to confer on this request please advise of times on Monday when you are available. Due to the time limitations we do intend to raise this issue at Wednesday's conference if not agreed by then.

Chris has advised us of the meet and confer earlier today. Plaintiffs cannot agree to a briefing schedule on the motion you described during the call, specifically that you want to first file a motion for a protective order to preclude the deposition of Mr. Chen in June. We believe the motion would need to be filed and heard in advance of the scheduled deposition date.

With regard to the date of the deposition, as discussed on the call today, we need to move the date as the deposition is currently scheduled to begin on May 31, 2018, which would necessitate all counsel working through Memorial Day weekend. As communicated, we request rescheduling to begin either on June 3 or June 7 (eastern time).

Please advise.

Adam M. Slater

Certified as a Civil Trial Attorney  
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